### REPORT/RECOMMENDATION TO THE BOARD OF SUPERVISORS OF SAN BERNARDINO COUNTY, CALIFORNIA AND RECORD OF ACTION

November 17, 2009

FROM:

**COLLEEN KRYGIER, Director** 

**Department of Aging and Adult Services** 

SUBJECT:

IHSS PROGRAM INTEGRITY AND FRAUD PREVENTION PLAN

### RECOMMENDATION(S)

Approve the IHSS Program Integrity and Fraud Prevention Plan and authorize submission to the State of California, Department of Social Service as required to receive funding to assist in deterring fraud in the In-Home Supportive Services program for the period of November 1, 2009 through June 30, 2010.

(Affected Districts: All)

(Presenter: Colleen Krygier, Director, 891-3917)

### BACKGROUND INFORMATION

The State of California, Department of Social Services (CDSS), under The State's Budget Act of 2009, is providing State funds to counties for the purpose of fraud prevention, detection, referral, investigation, and additional integrity efforts related to the In-Home Supportive Services (IHSS) Program. Counties are required to submit a plan for State approval in order to receive a portion of the \$10 million in State funds appropriated for this program.

On October 6, 2009, the Department of Aging and Adult Services (DAAS) was notified by CDSS of additional State funds targeted for anti-fraud activities for the IHSS program, California's largest in-home care program. In San Bernardino County, the Department of Aging and Adult Services (DAAS) maintains the IHSS program as a service to eligible County residents. The IHSS program is a Federal, State, and locally funded in-home care program that provides personal care and domestic services to aged, blind, or disabled individuals in their own homes. The purpose of the program is to allow these individuals to live safely at home rather than in costly and less desirable out of-home placement facilities.

IHSS program regulations and practices are meant to ensure only those who qualify for IHSS are authorized to receive benefits. However, the potential for fraud in IHSS exists. DAAS has developed the IHSS Program Integrity and Fraud Prevention Plan (Plan) in an effort to deter fraud within the IHSS program. The Plan is a collaborative effort, led by DAAS, with input of the San Bernardino County District Attorney's Office (DA) and the State of California, Department of

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DAAS-Krygier w/ plan County Counsel-Carey-Wilson **HS-Hallen** CAO-Chacon File -DAAS w/ plan 11/19/09

MOTION

Record of Action of the Board of Supervisors

MOVI

DATÉD: November 17

ITEM 10

# IHSS Program Integrity and Fraud Prevention Plan

San Bernardino County
Department of Aging and Adult
Services

Prepared by:

County of San Bernardino

Department of Aging and Adult Services

Colleen Krygier, Director

**Program Development Division** 

Jeanine Chenault, Deputy Director November 1, 2009







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### **Verification of Intent**

The IHSS Program Integrity and Fraud Prevention Plan is hereby submitted for the State of California Department of Social Services requesting participation in the Enhanced Anti-Fraud Program for the period **November 1**, **2009** through **June 30**, **2010**. It includes all assurances and plans to be conducted by the San Bernardino County Department of Aging and Adult Services in conjunction with the San Bernardino County District Attorney's Office and the State of California Department of Health Care Services.

### **Board of Supervisor Approval**

Approved on November 17, 2009, by the County Board of Supervisors Name of Approver: Gary C. Ovitt-Chairman

Signature

Name of County District Attorney Representative: Gary Fagan, Chief Deputy

County District Attorney Representative Telephone #: 909-891-3338

Email Address: gfagan@sbcda.org

Name of County Welfare Department Representative: Colleen Krygier, Director Department

of Aging & Adult Services

County Welfare Department Representative Telephone #: 909-891-3917

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# SBC Program Integrity and Frand Prevention Plan

### Overview of Plan

### INTRODUCTION

The In-Home Supportive Services (IHSS) program is California's largest in-home care program. IHSS' provides personal care and domestic services to aged, blind or disabled individuals in their own homes. The purpose of the program is to allow these individuals to live safely at home rather than in costly and less desirable out of-home placement facilities.

Since April 2002, the IHSS recipient population in San Bernardino County has grown by 67.3% and provider enrollment has grown by 56.4%. Currently, 86 social workers are responsible for more than 20,000 IHSS recipients. Social workers determine if recipients are eligible and make annual visits to determine continuing eligibility for the IHSS program.

IHSS program regulations and practices are meant to ensure that only those who need IHSS are authorized to receive benefits. However, the potential for fraud in IHSS exists. Fraud affects recipients, providers, and the taxpayer. Fraud occurs through misrepresentation by recipients and providers, and impacts more than financial losses. This fraud also impacts the health and well-being of this frail population and results in lost wages to providers. IHSS fraud investigations are currently based on reports of suspected fraud by the public and referrals by social workers. These reports of suspected fraud are referred to the investigations unit for the State of California Department of Health Care Services (DHCS). DHCS will conduct formal investigations.

San Bernardino County Department of Aging and Adult Services (DAAS) plans to use State funds to enhance current strategies targeted to deter fraud within the IHSS program. The plan is a collaborative effort, led by DAAS, with input of the San Bernardino County District Attorney's Office (DA) and DHCS. The County plan consists of five essential elements that serve as the foundation to improve current fraud prevention activities.

Prevention	Awareness Program	fraining: Recipients/ Providers	Fraud Tip Hotline	80 0 8 15 U
Detection	Training: Social Workers	Data Analysis	Referral Process	Tracking: Referrals
Investigation	Unannounced Home Calls	Tracking: Investigation Outcomes		
Collection	Centralize Process	Tracking: Restitution	Repayment Letters	4 SE
Prosecution	District Attorney	Conviction	Restitution	Tracking:

# SBC Program Integrity and Frand Prevention Plan

## **Purpose**

The vision of the San Bernardino County IHSS Program Integrity and Fraud Prevention Plan model is that it serves as a comprehensive strategy, which will enhance IHSS program integrity to:

- Reduce fraud and abuse,
- Empower staff to correctly identify and document incidents,
- Enhance collaboration methods between IHSS, the DA, and State agencies, and
- Obtain successful prosecution and restitution.

If the plan is approved by the California Department of Social Services (CDSS), San Bernardino County Department of Human Services certifies that program integrity efforts will commence within 60 days of receipt of funding.

## Methodology

### **OVERVIEW**

Five essential elements encompass the IHSS Program Integrity and Fraud Prevention Plan: Prevention, detection, investigation, collection, and prosecution. With this focus, the County will integrate newly allocated funds to address anti-fraud components that will enhance and improve existing fraud prevention activities.

The Fraud Prevention Taskforce is a collaborative effort between DAAS, the DA, and DHCS. The taskforce is comprised of designated County staff and DHCS investigators assigned to the County region. The taskforce concentrates on fraud detection and referral activities.

DAAS will work in conjunction with the Program Development Department (PDD) to coordinate implementation of the business process of this proposed anti-fraud plan.

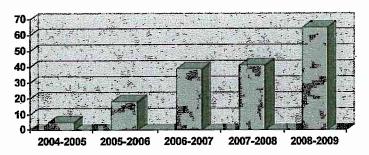
# SIXC Program Integrity and Fraud Prevention Plan

### **CURRENT ANTI-FRAUD ACTIVITIES**

San Bernardino County's current taskforce anti-fraud activities include:

- Centralize fraud referrals
- Maintain County-wide Fraud Tip Hotline
- Monitor Case Management Information and Payrolling System (CMIPS) Reports that include 300+ hour report, Death Match report, 60-Day No Timesheet Activity, etc.
- Cross match records for employees and Providers
- Cross match records for employees and Recipients
- Cross match on recipient/provider
- Enhance policies and procedures for detering and reporting fraud
- Requirement for County staff to disclose employment as a IHSS Provider

Since inception of the Fraud Prevention Taskforce, fraud referrals have increased significantly. As shown below, IHSS fraud referrals increased by 58% in the last two years.



# Referrals to DHCS

### PROPOSED ANTI-FRAUD ACTIVITIES

San Bernardino County proposed anti-fraud activities include:

- Develop an in-County investigation process
- Create an IHSS Fraud Investigations Unit
  - o Conduct unannounced home visits
  - o Conduct data analysis
    - Track: referrals, investigations, restitution, prosecutions
  - Report Processing (Death match, multiple address match reports, employee/client cases, etc.)
- Assess fraudulent cases and escalate to appropriate agency
  - When warranted, resolve cases through repayment agreements
- Centralize overpayments/underpayments process
  - o Identify triggers for fraud referral initiation
  - Conduct collection activities
- Establish a Fraud Awareness Program Internal/External training
- Maintain/Handle Fraud Tip Hotline
- Enhance collaboration with DA, DHCS, and CDSS

### IHSS FRAUD INVESTIGATIONS UNIT

The Fraud Prevention Taskforce will evolve to the IHSS Fraud Investigations Unit (FIU) to handle all anti-fraud activities for IHSS. FIU will consist of social workers and County Fraud Investigators who will examine suspected cases of fraud by recipients, providers, and employees. FIU will process IHSS fraud referrals and co-report accordingly to DHCS for escalated investigations and to the DA for substantiated fraudulent cases. In addition, FIU will

- Conduct unannounced home visits
- Conduct data analysis
  - o Track: referrals, investigations, restitution, prosecutions
- Process reports (Death match, multiple address match reports, employee/client cases, etc.)
- Assess fraudulent cases and escalate to appropriate agency
- Serve as the collections entity and resolve overpayments through repayment agreements
- Maintain the Fraud Tip Hotline

Refer to Attachment A which provides statistical information for the last five fiscal years regarding fraud referrals and outcomes.

### **INVESTIGATION PROCESS**

The table below provides a general concept of the proposed investigative business process in order to identify the levels of investigation and agency roles.

Part	Function	Action
Reported Fraud  fraud referrals  public fraud complaints  Fraud Tip Hotline referrals	FIU receives all:	<ul> <li>FIU completes research and determines if there is suspected fraud that:         <ul> <li>Requires collateral contact, then FIU will assign fraud referral to the County Fraud Investigator for a formal investigation.</li> <li>Is over \$500 amount, then FIU will send the fraud referral directly to DHCS Investigations Unit for a formal investigation.</li> </ul> </li> </ul>
Investigation	County Fraud Investigator	<ul> <li>Investigator conducts formal investigation:</li> <li>If evidence results in provable fraud, DAAS will work with the DA to determine if the case meets oversight or criminal criteria.</li> </ul>
	DHCS fraud Investigation Unit	<ul> <li>DHCS conducts formal investigation:</li> <li>If evidence results in provable fraud, DHCS refers investigation to the DA to prosecute on criminal or civil charges.</li> </ul>

### FRAUD AWARENESS PROGRAM

In an effort to increase public and client fraud awareness, the awareness program will be developed by enhancing current training curriculums and creating additional training programs. In addition, San Bernardino County will create fraud awareness materials that will be utilized in DAAS lobbies, orientations, and home visits as follows:

- Display anti-fraud posters in County offices
- Show anti-fraud campaign video at provider orientations
- Enhance current training plans to incorporate program integrity modules
  - o Fraud detection
  - o Interviewing techniques
  - County fraud policies and procedures
  - o Training on both internal and external fraud

# Overpayments and Underpayments

DAAS will continue to identify overpayments per current practice and begin to identify and track underpayments as required by CDSS. DAAS has dedicated staff responsible for auditing the overpayment and underpayment reports. With additional funding, we will centralize these activities in the FIU unit that will routinely audit and review the overpayment/underpayment business process. By centralizing this process, DAAS will enhance current activities to further identify/reduce overpayments/underpayments by proposing the following:

Identifying overpayments/underpayments:

- Conduct unannounced home visits
- Respond to complaints and hotline tips
- Review deathmatch report, 300+ hour provider report
- Review timesheet processing exeption report

# Reducing overpayments/underpayments:

- Educate clients on timely reporting
- Establish triggers for fraud referral initiation
- EnsureDAAS staff takes timely action on reported changes
- improve communication with Medi-Cal eligibility staff regarding reported changes

Implementation of this process will further reduce overpayment and fraudulent activities within the IHSS program. Refer to Attachment A which provides statistical information for the last five fiscal years regarding overpayments and underpayments.

# SBC Program Integray and Frand Prevention Plan

## **Partnerships and Collaborations**

### **DISTRICT ATTORNEY**

DAAS has a long standing partnership with the DA involving welfare fraud prevention and investigation. DAAS and the DA entered into a Memorandum of Understanding (MOU) outlining each entity's capabilities and service responsibilities. DAAS has specialized DA representation when handling IHSS cases. Collaboration by the DA and DAAS regarding anti-fraud activities include:

- Provide investigative training
- Work directly with IHSS FIU on investigations
- File criminal charges when investigations reveal evidence of provable fraud
- Continue with established satisfactory methods for the exchange of information necessary for each party to perform its duties and functions

### **DHCS INVESTIGATIONS UNIT**

DAAS continued collaboration with DHCS will enhance current processes and commitment to deterring IHSS fraud in San Bernardino County. With the implementation of this new plan, DHCS Investigations Unit is committed to:

- Train San Bernardino County IHSS staff on Fraud and Abuse
- Continue participation in the IHSS Fraud Taskforce (New IHSS FIU)
- Continue with established satisfactory methods for the exchange of information necessary for each party to perform its duties and functions

### **CDSS**

DAAS will continue to report to CDSS statistical reports on a quarterly basis. With this plan, DAAS proposes to enhance partnership with CDSS as follows:

- Collaborate with CDSS to determine suitable fraud statistics to be tracked
- Establish a CDSS point of contact
- Provide quarterly fraud reports to CDSS
- Identify and report anti-fraud best practices
- Assist CDSS with development of training tools for fraud identifiers
- Meet with CDSS on an as needed basis to confer and problem solve

# SBC Program Integrity and Frand Prevention Plan

## Tracking and Reporting

This plan will be implemented as soon as funds become available. San Bernardino County will commit to track and report outcomes of its efforts to CDSS by the set due date indicated by CDSS. Subsequent annual plans will be submitted to the CDSS as required.

# Implementation Budget

During the first year of implementation, DAAS in conjunction with the DA proposes the following budget for San Bernardino County IHSS Program Integrity and Fraud Prevention measures:

		A	nnual	Allocated Supervisor	C	ost per	F	Y 09-10	F	Y 10-11
Staffing	Position		Cost	per CW		norith		months		nonths
9	Social Worker II	\$	160,000		\$	13,333	\$	719,982	\$ 1	,439,964
6.52	Social Worker – Allocated Supervisors		160,000	\$ 24,540		2,045		110,430	\$	220,860
5	County Fraud Investigators	\$	143,000		\$	11,917	<u> </u>	357,510	\$	715,020
9.57	County Fraud Investigators  Allocated Supervisors	\$	143,000	\$ 14,943	\$	1,245	\$	37,350	\$	74,700
Direct Ch.	uge Costs			to the second					1	
15	Computers	\$	1,700			15,300				
15	MS Office License	\$	400		\$	3,600				
80	Hand held portable scanners	\$	250			12,500				
6	lap tops	\$	825		\$	7,425				
6	Ms/Office for lap tops	\$	400		\$	3,600				
6	VPN 1 time fee	\$	120		\$	1,080				
6	Monthly VPN fees		\$ 20 ach per nonth		\$	120	\$	720	\$	1,440
	Broad Band cards - 1 time		· 4							
6	fee	\$	75		\$	450				
6	Broad band monthly fees	\$	40		\$	240	\$	1,440	\$	2,880
15	Cell Phones	\$	50		\$	750	\$	300	\$	600
* Cost is b	ased on a fully loaded time stu	dy po	sition	Total	\$	61,130		,225,272	\$ 2	2,450,544
cost. The	costs include Administration co	osts, (	Office				\$	61,130		
Assistant,	Program Specialist, Deputy Dire	ector,	District		<u> </u>			-1		
Manager, Specialist	Supervising Fraud Investigator support and all vehicle costs.	, Fisc	al 	Total Cost			ş ı	,286,402	\$ :	2,450,544

### **Enclosures**

### ATTACHMENT A:

San Bernardino County Statistical Data Sheet for fiscal years 04-05 through 08-09.

# San Bernardino County Statistical Data FY 04-05 through 08-09

Overpayments identified by County GA	FY -04-05	FY 05-06	DD-AY	67 US	19-09
Total Amount per Fiscal Year	100 mg (100 mg	\$ 6463	\$ 7953	\$ 10,503	\$ 23,222
Number of Instances		7	15	12	44
Provider		0	6.	1	13
Recipient		7	9	11	31
County Error	•				
Unknown					
Other					
Underpayments identified by Coughty CA	5Y 59±65	FÝ 05:06	07-07	67-08	J-Y 02-09
Total Amount per Fiscal Year	NO DATA AVAILABLE				
Number of Instances					
Change of Hours identified by County OA			48 cases	91 cases	108 cases

Fraud Referrals/Outc	omes	FY 04-05	TY 05-06	FY 06 07	67 07-08	(A)
Number of referrals to DHCS		5	18	39	41	65
Number handled locally by DA		17	27	4	18	15
Number of convictions		13	13	3	10	4
Court Ordered Restitution		13	13	3	10	4
Amounts of funds involved in th	e convictions	\$109,331	\$70,981	\$32,806	\$156,668	\$8,399
Amount of funds recovered		\$64,185	\$73,020	\$31,611	\$145,761	\$8,399
Amount of funds pending recov	ery					
Basis for the Conviction						
Į,	Recipient				1	
F	Provider	13	13	3 .	9	4
ि	County staff					
বি	Other					
lī.	Jnknown					

	FY	TO THE STATE OF TH	IN IN	IV.	FY
Documented referrals to DA	04-05	05-06	06-07	07-08	08-09
Accepted	17	27	4	18	15
Rejected	1	2	1	1	2
Pending					
Completed Investigations					
No Fraud					
Total Dollar Amounts	\$136,932	\$136,958	\$40,842	\$194,147	\$51,474
Cases Referred for Prosecution	17	25	3	17	15
Criminal Charges Filed	17	25	3	17	15
No Charged Filed	1	2	1	1	2
Convictions	13	13	3	10	4
Acquittals					
Dismissals	4	4	0	1	
Pending investigations					
Rectution					
Court Ordered	13	13	3	10	3
Dollars Collected in Restitution					
Action	\$64,185	\$73,020	\$31,611	\$145,761	\$6,518
Fines					
Prosecutions Completed	14	21	3	10	4
Corvactions					
Misdemeanor	10	11	1	5	4
Felony	3	2	2	. 5	0

# San Bernardino County Budget Justification

# IHSS Fraud Investigations Unit Fraud Funding Plan for FY 2009-10

Buc	get Section	Total
A.	Personal Costs (Includes Employee benefits)	\$981,787
_	Operating Expenses	\$60,983
	Equipment Expenses	\$200,000
	Travel/Per Diem and Training	\$13,230
Ť	Total Expenses	\$1,256,000

	sonnel Costs (Including employee benefits)	Total Budge
Title:	7 Social Worker IIs	
	Salary Calculation: Salary \$55,750 Benefits \$22,662 Personnel/Overhead \$65920 /6months X 7 Duties: Work in IHSS Fraud Investigations Unit (FIU). Conduct initial investigation process by making announced home visits, reviewing reports and assessing fraudulent cases, and escalate to appropriate agency when warranted. Work in conjunction with County investigators. Collaborate with the State Investigations and District Attorney to peprare fraudelent cases for prosecution. Utilize state of the art database to report and track fraud referrals and outcomes.	\$505,162
itle:	1 Supervising Social Service Practitioner	
	Salary Calculation: Salary \$76,713 Benefits \$32,917 Personnel/Overhead \$65,920 /6 months Duties: Supervise the fraud investigations unit operations. Ensure adherence to County policy and productivity standards are maintained. Serve as liaison between FIU and regular IHSS staff. Use state of the art database to track unit productivity and fraud referrals and outcomes. Generate statistical reports. Serve as point of contact for County and state fraud investigators.	\$87,775
itle:	2 PID Fraud Invesitgators	
	Salary Calculation: Salary \$70,336 Benefits \$30,885 Personnel/Overhead \$42,195 /6 months X2  Duties: Devoted to work in IHSS FIU to investigate IHSS fraud. Work with District Attorney and state fraud agencies to bring fraud suspects to justice. Provide court testimony on behalf of the department.	\$143,416
Title:	1 Supervising Fraud Investigator Salary Calculation: Salary \$77,565 Benefits \$36,639 Personnel/Overhead \$42,195 /6 months Duties: Supervise County fraud investigators. Ensure adherence to County policy and productivity standards are maintained. Assist in fraud investigations and provide necessary resources to subordinate staff.	\$78,200
Title:	1 Office Assistant	
	Salary Calculation: Salary \$34,165 Benefits \$16,113 /6 months  Duties: Will provide all clerical support to FIU staff. Will utilize FIU database to conduct data entry on all fraud referrals and reporting results.	\$25,139
Titlo	1 District Manager at .25 FTE	
· · · · · ·	Salary Calculation: Salary \$84,480 Benefits \$29,173 / .25 FTE / 6 months Description: Implementation cost (one time only) assessed for handling unit's logistics and processes. The District Manager will be the administrator of FIU. Reports to Department executives unit status, progress, and will be contact person to provice annual reporting to the state. Will be part of overhead following the future fiscal years.	\$14,206
Title	1 Program Specialist	
	Salary Calculation: Salary \$64,561 Benefits \$28,029 / 6 months Description: Implementation Cost. Program Specialist I will develop FUI program policy development and	\$46,295
	media materials.	
Title:	1 Program Specialist II at .5 FTE	
	Salary Calculation: Salary \$ 69,489 Benefits \$25,690 / .5 FTE / 6 months  Description: Implementation Cost. Program Specialist II serves as a lead and mentor in the development	\$23,794
Title	of FIU policy development and implementation.  2 Fiscal Specialist	
iluei	Salary Calculation: Salary \$41,397 Benefits \$16,403 / 6 months  Description: Implementation Cost. Provide fiscal assistance and develop FIU budget plan. Continue assessing the unit during the implementation phase to adjust budget plan accordingly.	\$57,800
	assessing the unit during the implementation phase to adjust budget plan accordingly.  Total Personnel Costs	\$981,7

B. Equ	ipment Expenses	Total Budget
	9 Computers Systems  Description: Cost of \$1123.90 each. Computers will provide the unit with the tools necessary to complete	\$10,115
	fraud referals and investigations, and record outcomes. Computers will also facilitate use of the Fraud Investigations Unit database.	<b>410</b> ,110
Title:	9 Office 2007 Pro Licenses  Description: Cost of \$425 each. Office applications enable the Unit to access appropriate forms and	\$3,825
	policies, and utilize applications accordingy.	Na Lite
	9 Sets of Monitors	\$1,800
	Description: Cost of \$200 each. Necessary component of the computer systems.	
	9 Dual Mounting Monitor Brackets  Description: Cost of \$173 each. Necessary component of computer system.	\$1,557
Title:	5 58" Plasma Televisions שפאנרוסדונסה: Cost of \$275 each. Televisions will be mounted in the 5 County conference rooms where	
	provider orientations are held. Televisions allow the State Fraud CD to be viewed in a large forum. In addition, all offices will have the ability to effectively provide fraud awareness outreach to both providers	\$13, <mark>265</mark>
	and clients.	Contract of the Contract of th
	5 Plasma Mounting Brackets  Description: Cost of \$69 each. Necessary component to the Televisions	\$345
Title:	5 Plasma Speakers	\$2,380
	Description: Cost of \$476 each. Necessary component to the Televisions.	
litie:	100 Portable Scanners שescription: בסגד סז אָבט each. Portable scanners will allow all וואט staff to view original וט documents	dor ooo
	and immediately obtain copies. This process minimizes fraudelent cases where misrepresentation of	\$25,000
	clients and providers occur.	
	2 System Printers	\$2,696
	Description: Cost of \$1348 each. Necessary component for workload.	
	Total Equipment Costs	\$60,983

C. Ope	erating Expenses	Total Budget
Title:	Training  Description: Training developed by collaboration of the District Attorney, State DCHS Fraud Investigations  Unit, and County training department. Training will not only be developed for FIU, but will be made	
	available online for all IHSS staff. Development and programming assessed as a one time cost of \$100,000.	100,000
Title:	Public Relations Campaign	
	<b>Description:</b> Campaingn development of posters, handouts, county anti-fraud video, puchasing FIU outreach materials such as pens/pencils, magnets, etc.	35,000
Title:	Printing Costs	
	<b>Description:</b> Bulk printing cost of FIU materials such as forms, policies, and deskaids. In addition, cost of printing outreach materials, such as posters, handouts, and brochures.	15,000
Title:	Tracking and Reporting Database	
	<b>Description:</b> IT Department will assist in the development of a state-of-the-art database that will house FIU productivity and will have data tracking and reporting capabilites. This database will house all fraud referrals and outcomes wich will include tracking of overpayments/underpayments, and restitutions.	
	Development and programming assessed as one time cost of \$50,000.	50,000
	Total Operating Costs	200,000

D. Travel Expenses	Total Budget
Title: 9 Vehicles	ATT REALTS
Description: Usage for 7 SW and 2 Fraud Investigators. mileage 37cents average monthly mileage 5	00 =
\$185.00 per car. Monthly cost for cars: \$540 and Mileage Cost: \$ 1665	13,230
Total Trav	el Costs 13,230